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5 Attorneys for Plaintiff, LITTLE WHITE DOVE,
6 LLC

7 **IN THE UNITED STATES DISTRICT COURT**
8 **FOR THE DISTRICT OF ALASKA**

9 IN THE MATTER OF THE COMPLAINT OF
10 LITTLE WHITE DOVE, LLC, an Alaska
Limited Liability Company, Owner of the F/V
11 LITTLE WHITE DOVE, Official No. 607001,
for exoneration from or limitation of liability,

12 Plaintiff.

IN ADMIRALITY

Case No. 3:05-CV-0067-JWS

13
14 **MOTION TO EXTEND DISCOVERY**

15 Petitioner motions the court to extend discovery. It appears the parties mistakenly
16 believed discovery was stayed already due to the filing of the appeal, until the Court's recent
17 discovery order was received. Petitioner apologizes for this confusion, and did not realize until
18 the Order that an interlocutory appeal was at issue. After the appearance of new counsel for the
19 claimants, extensions of discovery were discussed, however, the motion to proceed in State
20 Court and subsequent appeal were filed. The parties have not yet completed discovery which
21 will require deposition travel and proceedings to occur in Cold Bay, Alaska and Sand Point,
22 Alaska. Petitioner respectfully requests 60 days to complete depositions until November 15,
23 2006, and expects hearing of the limitation could occur shortly thereafter.

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DATED this _____ day of September 2006 at Anchorage, Alaska.

FARLEY & GRAVES, P. C.

By: s/Cheryl L. Graves

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Attorneys for Plaintiff, Little White Dove,
LLC

CERTIFICATE OF SERVICE

Pursuant to Civil Rule 5, I hereby certify that on this
11th day of September 2006, I caused a true and correct copy
of the Cross Motion to Extend Discovery to be served
electronically on the following person(s):

Charles W. Ray, Jr., Esq.
Law Offices of Charles W. Ray, Jr., P.C.
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Anchorage, AK 99501

By: s/Cheryl L. Graves